

**TNRCC**Protecting Texas
By Reducing and
Preventing Pollution

FAX TRANSMITTAL

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Organization Fugro
FAX Number 714-975-2260

REDACTED VERSION

FROM: TEXAS NATURAL RESOURCE CONSERVATION COMMISSION
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Environmental Assessment Program
Region 12 - Houston
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NOTES:

Olin - Wallerville
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CommissionPROJ. # _____
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HEADLINE _____

Texas Water Commission

INTEROFFICE MEMORANDUM

TO : FILE
Ernest Heyer, Head, Program Services Unit
THRU : Field Operations Division

DATE: 5-17-90

FROM : Stennie Meadours,
Emergency Response Coordinator, SER

SUBJECT: Olin/Texas Water Commission
Settlement Agreement
Sample Analysis Results

Background

The manufacture of toxaphene, DDT and other pesticides was conducted at the former Olin site at 7621 Wallisville, Houston during the early 1940's until sometime in the late 1970's or early 1980's. Concentrations of toxaphene and other pesticides in the DDT group were documented by 1980-81 by Environmental Protection Agency (EPA) analytical activities. Initially, EPA pursued enforcement of the subject site and performed an historical aerial photographic analysis of the Olin site. Several solid waste management units including surface impoundments and surface dumps were identified by the EPA study (Photographic analysis of the Olin Hazardous Waste Site Houston, Texas, EPA June 1981, copy in Deer Park office). Sometime around 1984, the EPA referred the Olin site to the Texas Department of Water Resources for enforcement action. On June 16, 1988 the Texas Water Commission and Olin signed a settlement agreement which resulted from lawsuit NO. 394,086, Olin Corporation V. The Texas Water Commission, The United States Environmental Protection Agency, Eureka Investment Company, Southern Pacific Transportation Company and Houston Belt and Terminal Railway Co, in the 299th Judicial District Court of Travis County, Texas.

Current Status

On or about August 12, 1988, Stennie Meadours of the Deer Park office was assigned as district representative to monitor the remedial activities resulting from the Olin Corporation/Texas Water Commission Settlement Agreement of June 16, 1988. This agreement described remedial actions to be conducted by Olin Corporation adjacent to their previously owned and operated site at 7621 Wallisville Road, Houston. Site visits and monitoring of sampling and remedial activities at the 7621 Wallisville site was conducted on the following dates by the listed district personnel:

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August 18, 22, 23, 24, and 26, 1988 - Stennie Meadours
March 19, 1989 - Stennie Meadours
April 20, 1989 - Stennie Meadours
May 10, 1989 - Stennie Meadours, Glynna Leiper
May 16, 1989 - Eddie Elliot
May 23, 1989 - Stennie Meadours
June 9, 1989 - Stennie Meadours
August 25, 1989 - Stennie Meadours, Eddie Elliot
August 30, 1989 - Stennie Meadours, Ata Rahman and Mac Vilas

The documents and correspondence relevant to this report are attached and consist of the following:

- Attachment 1: Attorney General correspondence dated June 16, 1988 conveying the TWC/Olin Settlement Agreement and describing the dates of compliance as November 1, 1988 sampling, excavation and backfilling deadline, December 15, 1988 as deadline for submission of the engineer's certificate. (To date the engineer's certificate has not been submitted to the Deer Park office.)
- Attachment 2: Olin Corp.'s correspondence dated September 12, 1988 conveying Olin's Request for Proposal to perform the required work and acknowledging TWC concerns regarding the sampling that has already occurred.
- Attachment 3: Olin Corp's correspondence dated November 8, 1988 conveying the analytical results* of Olin's sample events which took place during August 23, 1988 thru August 29, 1988 and consisted of:
1. Four location along a line 20' south of (b) (6) residence running west. (As described in B.2 of investigation plan and identified in results as OG-1 thru OG-4.)
 2. Seven locations on (b) (6) property along the southern (b) (6) property line. (As described in B.1 of investigation plan and identified in results as ED-1-B 2'-3' thru ED-7-C.)
 3. Fifteen locations in ditch West of 7621 Wallisville site adjacent to Houston Belt and Terminals railway. (As described in A.1 and 2. of investigation plan and identified in results as ND-1-B thru ND-15A.)

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*site drawing with sample locations identified included in this attachment by writer.

- Attachment 4: TWC, Deer Park office report dated February 10, 1989 conveying results of sample events that took place adjacent to the former Olin site and the (b) (6) property on August 22, 23 and 26, 1988. Five samples of surface soils were collected and are identified by Chain of Custody Tag (COC) numbers.
- Attachment 5: TWC/Olin Technical Conference on February 15, 1989 where Olin stated proposed excavation to a depth of 3' with the exception of ND-2,4,6, where they planned to excavate to 4' and possibly deeper at ND 2 & 4. In regards to TWC sample results (COC SW 14838) indicating pesticide contamination of 20 ppm in an area not planned for remediation activities. Olin officials stated they did not contemplate excavation beyond that which will be proposed in forthcoming plan addressing the ED and ND areas described in the plan.
- Attachment 6: Olin Letters of Transmittal dated February 28, 1989 conveying the draft remediation plan promised by Olin during the February 15, 1989 technical conference.
- Attachment 7: TWC telephone memo dated March 29, 1989 documenting a conversation between Tim Chaney (TWC) and Verill Norwood (Olin) in which Tim Chaney expressed to Mr. Norwood that Olin activities and Remediation Plan to date did not conform to the investigation plan included in the Settlement Agreement. Areas where additional sampling was needed to determine the vertical extent of contamination were identified by Mr. Chaney.
- Attachment 8: Woodward-Clyde Consultants correspondence dated April 3, 1989 conveying a copy of the final remediation plan and expressing the incorporation of all Mr. Chaney's comments to Mr. Norwood.
- Attachment 9: Attorney General's correspondence dated April 14, 1989 regarding (b) (6) release authorizing access to and sampling activities on her property and authorizing the use of a power driven augur in certain sampling points.

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Attachment 10: Tim Chaney (TWC) telephone memo documenting a conversation with Brian Berwick concerning notification of the SER Office prior to sampling or excavation work.

Attachment 11: Attorney General's faxed copy dated May 25, 1989 an unsigned version of the Release and Access Agreement prepared for (b) (6) signature.

Attachment 12: TWC Service Request dated May 23, 1989 in which (b) (6) requests:
• Information regarding Wallisville/Olin site remedial work
• Analysis results of samples collected on the (b) (6) property and a TWC citizens request for assistance requesting soil sample collection and analyses on the (b) (6) property.

Attachment 13: TWC Woodward-Clyde Consultants correspondence dated May 25, 1989 recommending a layer of stone approximately 10 to 12 inches be placed in the excavated ditch provided that it is underlain by 3 feet of clay backfill. In addition, the correspondence states that the caliche used as a road bed for the Wallisville excavations is considered adequate for use as a cover for the clay.

Attachment 14: Photographs (to be included under separate cover).

As requested by (b) (6) on May 23, 1989, on August 25, and 30 1989, eleven soil samples were collected in (b) (6) yard adjacent to the area remediated. The samples were analyzed for pesticides, toxaphene and BHC (lindane). The results of the sample analysis are shown in the table entitled Olin/Gloyd Analyses Results and a map of sample locations is attached to the table.

Action Requested

This incident of a documented release of a toxic pesticide is being referred to the TWC hazardous waste screening committee for evaluation and a recommended course of action. Three possible actions which may be considered are:

1. Require additional investigative and remedial actions of Olin Corp.

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Olin/Gloyd Analyses Results

Chain of
Custody

Tag # SW02637 SW02638 SW02639 SW02640 SW02641 SW02642 SW02643 SW02644 SW02645 SW02646 SW02647

Date 8-25-89 8-25-89 8-25-89 8-25-89 8-30-89 8-30-89 8-30-89 8-30-89 8-30-89 8-30-89 8-30-89

Location**

Sample # #1 #2 #3 #4 #5 #6 #7 #8 #9 #10 #11

Chemical

Toxaphene * * 8.2 49.5 21.0 1.3 * 0.6 156.0 0.4 <0.05

Deildrin 0.005 0.06 0.003 -- 0.03 0.004 0.01 -- -- 0.003 --

Lindane <0.001 <.001 <.001 <.001 <.001 <.001 <.001 <.001 <.001 <.001 <.001

Chlordane -- -- -- -- -- -- -- -- -- -- 0.02

PP'DDE 0.08 1.0 .06 1.6 0.1 -- 0.13 -- -- 0.09 --

PPDDT 0.07 2.0 -- -- -- -- 0.09 -- -- -- 0.15

OP'DDT -- -- -- -- -- -- -- -- -- -- --

All units in ppm.

Chain of Custody Tags are attached.

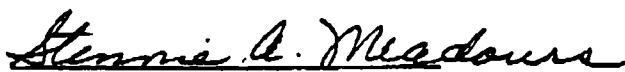
*Unable to detect due to high background interference.

**Sample location map attached.

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2. Execute a state funded emergency action from either the Texas Spill Response Fund or the Hazardous Waste Disposal Fee Fund.
3. Consider the source of the contamination, the former pesticide manufacturing site, for ranking on the National Priorities List. (To date this office is unaware of any investigations conducted at the manufacturing site.)

Signed:



Stennie A. Meadours
Emergency Response Coordinator
Hazardous and Solid Waste
Southeast Region

SM/ja

FLUOR DANIEL

